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FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

AUG 10 2021

SEAN F. MCAVOY, CLERK
DEPUTY
YAKIMA, WASHINGTON

7 UNITED STATES DISTRICT COURT
8 FOR THE EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,
10

11 Plaintiff,

12 v.
13

14 ROBERT SILVIO AGLI and
15 MARIA RACHEL MENDOZA,

16 Defendants.
17

4:21-CR-6033-SAB

INDICTMENT

Vio: 21 U.S.C. § 841(a)(1),
(b)(1)(A)(viii)
Possession with Intent to
Distribute of 50 Grams or
More of Actual (Pure)
Methamphetamine

21 U.S.C. § 853
Forfeiture Allegations

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21 The Grand Jury charges:

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23 On or about July 11, 2019, in the Eastern District of Washington, the
24 Defendants, ROBERT SILVIO AGLI and MARIA RACHEL MENDOZA, did
25 knowingly and intentionally possess with intent to distribute 50 grams or more of
26 actual (pure) methamphetamine, a Schedule II controlled substance, in violation of
27 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii).
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NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. § 841, as set forth in this Indictment, the Defendants ROBERT SILVIO AGLI and MARIA RACHEL MENDOZA, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense.

If any of the property described above, as a result of any act or omission of the Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

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1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p).

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4 DATED this 10th day of August 2021.

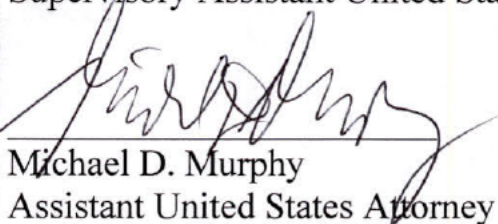
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6 A TRUE BILL

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8 r oreperson
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10 Joseph H. Harrington
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14 Thomas J. Hanlon
15 Supervisory Assistant United States Attorney

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